

## State Water Resources Control Board

January 27, 2016

(Via email and Certified Mail)

**CERTIFIED MAIL**

**NO. 7015 1520 0001 8019 5210**

Mr. Collins Kalu  
Los Angeles County Metropolitan  
Transportation Authority  
One Gateway Plaza  
Los Angeles, California 9002  
[kaluc@metro.net](mailto:kaluc@metro.net)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT METRO DIVISION 6, 100 EAST SUNSET AVENUE, LOS  
ANGELES**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 14, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit</b> – The facility permit to operate is expired.	All	October 1, 2015	Ongoing	H&SC 25284(a)
2	<b>Failure to Maintain Facility and Tank Information (A&amp;B Forms)</b> – The Tank forms incorrectly list overfill prevention method as overfill alarm however, fill tube shut-off valves were observed during the inspection.	T5, T6	January 14, 2016	Ongoing	23 CCR 2711(a)(6)
3	<b>Failure to Maintain Plot Plan/Site Map</b> – Monitoring site plans do not include the location of the piping or monitoring equipment.	All	January 14, 2016	Ongoing	23 CCR 2711(a)(8)
4	<b>Failure to Tag Monitoring Equipment</b> – The tank gauge used for overfill prevention was not tagged.	T2	January 14, 2016	Ongoing	23 CCR 2641(j)

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	<b>Failure to Monitor Product Piping –</b> The sensor in the piping sumps were unable to detect a leak at the earliest opportunity because they were not positioned beneath the product lines and the test boots in the southeast transition sump were on.	T2, T6	January 14, 2016	Ongoing	23 CCR 2630(d)
6	<b>Failure to Install Line Leak Detectors –</b> Pneumatic pumps have pressurized underground piping without line leak detectors.	T5, T6	January 14, 2016	Ongoing	23 CCR 2636(f)(2)
7	<b>Failure to Maintain Spill Containment –</b> The failed component listed on the spill containment test has not been repaired or retested.	T5	September 1, 2015	Ongoing	H&SC 25284.2
8	<b>Failure to Maintain Secondary Containment –</b> The failed components listed on the secondary containment test have not been repaired or retested.	T5, T7	February 10, 2015	Ongoing	H&SC 25291(a)(2)
9	<b>Failure to Maintain Secondary Containment –</b> The failed components listed on the secondary containment test have not been repaired or successfully retested.	T2	February 13, 2012	Ongoing	H&SC 25291(a)(2)
10	<b>Tampering with Leak Detection Equipment –</b> The sensor in the southeast transition sump was raised above the fluid inside the sump to prevent alarm.	T5, T6	January 14, 2016	Ongoing	H&SC 25299(a)(9)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Mr. Thomas Henderson  
UST Enforcement Officer  
Office of Enforcement  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, California 95814  
[tom.henderson@waterboards.ca.gov](mailto:tom.henderson@waterboards.ca.gov)

**Local CUPA**

Mr. Reynaldo Husband  
Fire Inspector I  
Los Angeles City Fire Department  
200 Main Street, Suite 1700  
Los Angeles, California 90012  
[reynaldo.husband@lacity.org](mailto:reynaldo.husband@lacity.org)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Captain Daniel Dragotto  
Los Angeles City Fire Department  
[daniel.dragotto@lacity.org](mailto:daniel.dragotto@lacity.org)

Mr. Reynaldo Husband  
Fire Inspector  
Los Angeles City Fire Department  
[reynaldo.husband@lacity.org](mailto:reynaldo.husband@lacity.org)

Mr. James Jimenez  
Environmental Compliance & Services Manager  
Los Angeles County Metropolitan  
Transportation Authority  
[jjimenezja@metro.net](mailto:jjimenezja@metro.net)

Mr. Roger Uhden  
Sr. Environmental Specialist & Quality Assurance  
Los Angeles County Metropolitan  
Transportation Authority  
[uhdenr@metro.net](mailto:uhdenr@metro.net)